



SHERIFF'S OFFICE OF COOK COUNTY, ILLINOIS

## AFFIDAVIT OF SERVICE

**CT Corp.**



\* 0 3 1 6 1 7 \*

CASE NUMBER: 000484

MULT.SER. 1

DIE DATE: 03/04/2022

RECEIVED DATE: 2/18/2022  
12:00:00 PM

FILED DATE: 02/03/2022

Filed and Attested by the  
Office of Judicial Records  
29 APR 2022 10:07 am  
S. RICE

## DEFENDANT

ALLSTATE FIRE AND CASUALTY  
INSURANCE CO  
3100 SANDERS RD  
NORTHBROOK, IL 60062

## PLANTIFF

MUTAN, SABREEN

## ATTORNEY

PETRILLO AND GOLDBERG PC  
6951 N PARK DR  
PENNSAUKEN, NJ 08109

## ATTACHED FEE AMOUNT:

## SERVICE INFORMATION:

## I CERTIFY THAT I SERVED THE DEFENDANT/RESPONDENT AS FOLLOWS:

## (1) PERSONAL SERVICE:

BY LEAVING A COPY OF THE WRIT/ORDER WITH THE DEFENDANT/RESPONDENT PERSONALLY, AND INFORMING DEFENDANT/RESPONDENT OF CONTENTS.

## (2) SUBSTITUTE SERVICE:

BY LEAVING A COPY OF THE SUMMONS AND COMPLAINT AT THE DEFENDANT'S USUAL PLACE OF ABODE WITH A FAMILY MEMBER OR PERSON RESIDING THERE, 13 YEARS OR OLDER, AND INFORMING THAT PERSON OF THE CONTENTS OF THE SUMMONS. ALSO, A COPY OF THE SUMMONS WAS MAILED TO THE DEFENDANT AT HIS OR HER USUAL PLACE OF ABODE ON THE \_\_\_\_\_ DAY OF \_\_\_\_\_ 20\_\_\_\_

## (3) UNKNOWN OCCUPANTS:

BY LEAVING A COPY OF THE SUMMONS AND COMPLAINT NAMING "UNKNOWN OCCUPANTS" WITH A PERSON OF THE AGE OF 13 OR UPWARDS OCCUPYING SAID PREMISE.

## (4) CORP/CO/BUS/PART:

BY LEAVING THE APPROPRIATE NUMBER OF COPIES OF THE SUMMONS, COMPLAINTS, INTERROGATORIES, JUDGMENTS, CERTIFICATIONS AND NOTICES WITH THE REGISTERED AGENT, AUTHORIZED PERSON OR PARTNER OF THE DEFENDANT CORPORATION \_\_\_\_\_ COMPANY \_\_\_\_\_ BUSINESS \_\_\_\_\_ PARTNERSHIP \_\_\_\_\_

## (5) PROPERTY RECOVERED:

NO ONE PRESENT TO RECEIVE ORDER OF COURT. ORDER POSTED IN PLAIN VIEW.

## (6) S.O.S./D.O.I.:

BY LEAVING THE SUMMONS AND COMPLAINT WITH THE SECRETARY OF THE STATE/DIRECTOR OF INSURANCE OF THE STATE OF ILLINOIS, AN AGENT OF SAID DEFENDANT LISTED ABOVE. ANY AGENT OF SAID CORPORATION NOT FOUND IN THE COUNTY OF COOK.

## (7) CERTIFIED MAIL

\*\*\*\*\* COMPLETE THIS SECTION IF WRIT IS A THIRD PARTY CITATION/GARNISHMENT \*\*\*\*\*

(8) AND BY MAILING ON THE \_\_\_\_\_ DAY OF \_\_\_\_\_ 20\_\_\_\_ A COPY OF THE THIRD PARTY GARNISHMENT/CITATION SUMMONS AND NOTICE TO THE JUDGMENT DEBTOR'S LAST KNOWN ADDRESS AS INDICATED IN THE NOTICE WITHIN (2) BUSINESS DAYS OF SERVICE UPON GARNISHEE/THIRD PARTY DEFENDANT.

## THE NAMED DEFENDANT WAS NOT SERVED FOR THE GIVEN REASON BELOW:

(01) NO CONTACT

(05) WRONG ADDRESS

(09) DECEASED

(02) MOVED

(06) NO SUCH ADDRESS

(10) NO REGISTERED AGENT

(03) EMPTY LOT

(07) EMPLOYER REFUSAL

(11) OUT OF COOK COUNTY

(04) NOT LISTED

(08) CANCELLED BY PLAINTIFF ATTY

(12) OTHER REASON (EXPLAIN)

## EXPLANATION:

## WRIT SERVED ON:

SEX: M / F

RACE: B

AGE: 30

THIS 25 DAY OF FEB

20

Thomas J. Dart

SHERIFF, BY: K

DEPUTY

## ATTEMPTED SERVICES

DATE

TIME (AM/PM)

STAR #

2-25

09:29

10476

YPI605

Case ID: 220200484

IN THE COURT OF COMMON PLEAS PHILADELPHIA COUNTY  
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
TRIAL DIVISION - CIVIL

Filed and Attested by the  
Office of Judicial Records  
29 APR 2022 10:05 am  
S. RICE

Sabreen Mutan

Plaintiff

February TERM, 20 22

v.

NO. 000484

al.

Defendant

Capital Transport, Inc.  
320 Carrier Boulevard  
Richland, MS 39218

**RETURN OF SERVICE/AFFIDAVIT**

I, Deputy Christian Davis, hereby certify that I served a true and correct copy of the Complaint / Notice of Appeal / Rule on Capital Transport, Inc.  
(Insert Name of Party)

1) By handing a copy to the Defendant / Appellee, Capital Transport, Inc.,  
on the 2 day of March, 20 22, at 1515 AM/PM, at  
320 Carrier Boulevard, Richland, MS 39218

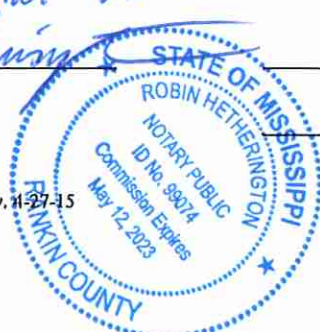
2) By handing a copy to \_\_\_\_\_, an adult  
member of the family/adult person in charge of Defendant's / Appellee's residence,  
on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_, at \_\_\_\_\_ AM/PM, at  
320 Carrier Boulevard, Richland, MS 39218

I verify that the statements in this Return of Service are true and correct. I further verify that I am an adult over the age of 18 and not related to any party in this action. I understand that this unsworn document contains statements that are made subject to the penalties of 18 P.C.S. §4904 relating to unsworn falsification to authorities.

Sworn to and Affirmed

This 2 day Mar 20 22

Robin Hetherington  
Notary Public  
(SEAL)



Christian Davis R91 (Sign)

Christian Davis R91 (Print Name)

Return of Service - rev. 11-27-15

RANKIN COUNTY SHERIFF DEPT.  
221 NORTH TIMBER ST.  
BRANDON, MS 39042

Case ID: 220200484

STATE OF MISSISSIPPI  
COUNTY OF RANKIN

I have this day executed the within writ by personally  
delivering true copies of the within writ

to Capitol Transport, Inc.,  
c/o Brian Martin H/R,

This the 2 day of March, 2022

BRYAN BAILEY, SHERIFF

BY Christina Davis R91 D.S.



# SHERIFF'S OFFICE, COUNTY OF KENDALL, ILLINOIS

## AFFIDAVIT OF SERVICE

Print Date/Time: 04/18/2022 08:43

Process Number: 2022-00000733

Paper Type: Summons/Complaint

Docket Number: 220200484

Expiration Date: 04/30/2022

Received Date: 04/18/2022 00:00

Plaintiff(s)

PETRILLO &amp; GOLDBERG

Filed and Attested by the  
Office of Judicial Records  
28 APR 2022 10:29 am  
G. IMPERATO

Defendant(s)

Person To Be Served: IAROSLAV  
TRANSPORTATION  
A

Serve At: 12732 S TIMBER WOOD CIR  
PLAINFIELD, IL 60585

I Certify that I served the above Papers on the Defendant as Follows:

- \_\_\_ 1.) PERSONAL SERVICE: By leaving a copy of the civil papers with the named defendant personally.
- \_\_\_ 2.) SUBSTITUTE SERVICE: By leaving a copy of the civil papers at the above abode with a member of the family or a person residing there 13 years of age or older, and informing that person of its contents. A copy will be mailed to the defendant at the above address. \*\*Mailed on \_\_\_ at \_\_\_ By: \_\_\_
- ☒ 3.) Service on: CORPORATION: ☒ COMPANY \_\_\_ BUSINESS \_\_\_ PARTNERSHIP \_\_\_  
By leaving a copy of the civil papers/interrogatories with the registered agent, authorized person or partner of Defd.
- \_\_\_ 4.) POSTED PAPERS
- \_\_\_ 5.) UNKNOWN OCCUPANTS NOTICE POSTED – Need on all eviction notices whether served or posted

Person served for Defendant/Witness Iaroslav Strynetskyi DOB 03/14/89 Sex M Race W Ht 6'3" Wt 250

Relationship to Defendant/Witness President

Address where served 12732 Timberwood Cr., Plainfield IL 60585 is address abode of Defd yes ☒ no \_\_\_

Township served Swego

Date of Service: This 18 day of April, 2022 Time: 7:34 AM ☒ PM

CIVIL PROCESS NOTES FOR THE DEPUTIES:

Reasons Not Served:

- \_\_\_ Moved
- \_\_\_ Wrong Address
- \_\_\_ Reached Due Date
- \_\_\_ Other Reasons

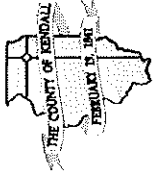
Dwight A. Baird  
Sheriff of Kendall County

Served by: [Signature]Badge# 51

Villagrana 51

Case ID: 220200484

# SHERIFF'S OFFICE, COUNTY OF KENDALL, ILLINOIS AFFIDAVIT OF SERVICE



Kendall County Sheriff's Office

Civil Process Service Worksheet

Process Number:

22-733

Date	Start/End Time	Minutes	Deputy/Badge#	Notes
4-18-22	1931		V. Magana SI	served
Total Minutes				

# SHERIFF'S OFFICE, COUNTY OF KENDALL, ILLINOIS

## AFFIDAVIT OF SERVICE

Print Date/Time: 04/18/2022 08:29

Process Number: 2022-00000732

Paper Type: Summons/Complaint

Docket Number: 220200484

Expiration Date: 04/30/2022

Received Date: 04/18/2022 00:00

 Plaintiff(s)  
 PETRILLO & GOLDBERG

Defendant(s)

 Person To Be Served: SIT EXPEDITORS, INC  
 None

Alerts:

 Serve At: 12732 S TIMBER WOOD CIR  
 PLAINFIELD, IL 60585

I Certify that I served the above Papers on the Defendant as Follows:

- \_\_\_ 1.) PERSONAL SERVICE: By leaving a copy of the civil papers with the named defendant personally.
- \_\_\_ 2.) SUBSTITUTE SERVICE: By leaving a copy of the civil papers at the above abode with a member of the family or a person residing there 13 years of age or older, and informing that person of its contents. A copy will be mailed to the defendant at the above address. \*\*Mailed on \_\_\_ at \_\_\_ By: \_\_\_
- ☒ 3.) Service on: CORPORATION: ☒ COMPANY \_\_\_ BUSINESS \_\_\_ PARTNERSHIP \_\_\_  
 By leaving a copy of the civil papers/interrogatories with the registered agent, authorized person or partner of Defd.
- \_\_\_ 4.) POSTED PAPERS
- \_\_\_ 5.) UNKNOWN OCCUPANTS NOTICE POSTED – Need on all eviction notices whether served or posted

Person served for Defendant/Witness Iaroslav Strynetskyi DOB 031489 M W 6'3" 250  
 Relationship to Defendant/Witness President  
 Address where served 12732 Timberwood Cr, Plainfield, IL 60585 is address abode of Defd yes ☒ no \_\_\_  
 Township served Oswego  
 Date of Service: This 18 day of April, 2022 Time: 7:34 AM ☒ PM

## CIVIL PROCESS NOTES FOR THE DEPUTIES:

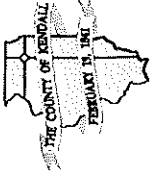
Reasons Not Served:

- \_\_\_ Moved  
 \_\_\_ Wrong Address  
 \_\_\_ Reached Due Date  
 \_\_\_ Other Reasons

 Dwight A. Baird  
 Sheriff of Kendall County
Served by: [Signature]Badge# 51Villagrana 51

# SHERIFF'S OFFICE, COUNTY OF KENDALL, ILLINOIS

## AFFIDAVIT OF SERVICE



Kendall County Sheriff's Office

Civil Process Service Worksheet

Process Number:

22-132

Date	Start/End Time	Minutes	Deputy/Badge#	Notes
4-18-22	1731		Villagrana 51	Served
Total Minutes				

LAW OFFICE OF DONNA M. DIPIETRO

By: Divya Wallace

Attorney I.D. No. 203882

1601 Market Street

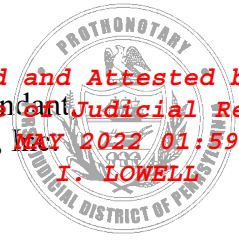
Suite 1040

Philadelphia, PA 19103

(215) 762-0400

[wallad10@nationwide.com](mailto:wallad10@nationwide.com)

Filed and Attested by the  
 Attorney for Defendant, Judicial Records  
 Capital Transport, Inc. MAY 2022 01:59 pm  
 I. LOWELL



SABREEN MUTAN	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY
vs.	:	
	:	FEBRUARY TERM, 2022
LEANID RUSINOUSKI	:	NO. 0484
and	:	
IAROSLAV TRANSPORTATION, INC.	:	
and	:	
SIT EXPEDITORS, INC.	:	
and	:	
CAPITAL TRANSPORT, INC.	:	
and	:	
ALLSTATE FIRE & CASUALTY	:	
INSURANCE COMPANY	:	
and	:	
JOHN DOE	:	

ENTRY OF APPEARANCE AND  
PERFECTED JURY TRIAL DEMAND

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of defendant, Capital Transport, Inc., in the above-captioned matter.

The defendant, Capital Transport, Inc., in the above-captioned case demands a Jury Trial of twelve (12) jurors. Kindly mark the docket "Jury Fee Paid" and accept the fee tendered herewith to Perfect the Demand for a Jury Trial.

A handwritten signature in blue ink that reads "Divya Wallace".

\_\_\_\_\_  
 DIVYA WALLACE  
 Attorney for Defendant,  
 Capital Transport, Inc.





IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY  
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
TRIAL DIVISION-CIVIL

DOCKETED  
CASE MANAGEMENT CENT

MAY 06 2022

T.ITALIANO

MUTAN

February Term 2022

VS

No. 00484

NOTGV-Mutan Vs Rusinouski Etal

RUSINOUSKI ETAL

**NOTICE OF RESCHEDULING**



22020048400015

The Case Management Conference for the above-captioned matter has been rescheduled for 09-JUN-2022 at 03:00 PM, using Zoom video conferencing.

Counsel and/or self-represented parties shall access the Case Management Conference by using the Zoom link posted on the following website under "Common Pleas - Civil Remote Hearing Info – FOR COUNSEL AND PARTIES": <https://www.courts.phila.gov/livestreams/civil/hearings/>

Scroll down within the section "Remote Hearing Information by Court Event Type" under "General Program Hearings" to "Case Management Conference - Civil Case Management Center" and click on "Join Case Management Conference". The Zoom link may be updated periodically, so use the Zoom link that is present on the date of the Conference.


All counsel and/or self-represented parties shall follow the Court's "Notice to the Bar" policies and Protocols for Use of Advanced Communication Technology for Court Proceedings in Civil Matters posted at <https://courts.phila.gov/covid-19>. **Participation in the Zoom conference by all counsel of record and unrepresented parties is mandatory.**

Counsel for plaintiff is directed to serve a copy of this notice on any unrepresented party and any attorney entering an appearance subsequent to the issuance of this notice. If the case settles prior to the conference, electronically file a settlement letter. To file the letter electronically, access the "Existing Case" section of the court's electronic filing system. Select "Conference Submissions" as the filing category. Select "Settlement Letter" as the document type. Any party not registered with the electronic filing system ("EFS") may submit the Settlement Letter via e-mail or USPS first class mail:

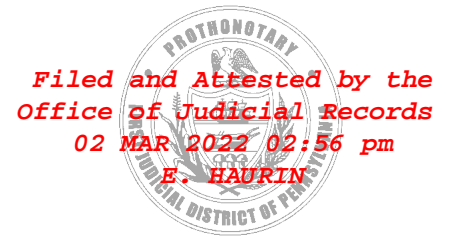
[CivilCaseManagement@courts.phila.gov](mailto:CivilCaseManagement@courts.phila.gov)  
Civil Case Management Conference Center  
613 City Hall  
Philadelphia, PA 19107

Questions concerning this notice and its contents shall be referred to 215-686-5135 or 215-686-3710.

**BY THE COURT:**

  
DANIEL ANDERS, J.  
TEAM LEADER

PETRILLO & GOLDBERG, P.C.  
By: SCOTT D. SCHULMAN, ESQUIRE  
I.D. #: 73642  
6951 North Park Drive  
Pennsauken, NJ 08109  
(856)486-4343  
ATTORNEYS FOR PLAINTIFF



<p>SABREEN MUTAN, Plaintiff,  v.  LEANID RUSINOUSKI, et al.  Defendants</p>	<p>PHILADELPHIA COUNTY COURT OF COMMON PLEAS  February TERM, 2022  NO. 000484</p>
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**PRAECIPE TO REINSTATE COMPLAINT**

**TO THE PROTHONOTARY:**

Kindly reinstate the attached complaint which was previously filed with the Court in the above captioned civil action for an additional 30 days.

By: /s/ Scott D. Schulman, Esquire  
SCOTT D. SCHULMAN, ESQUIRE  
Attorney for Plaintiff Sabreen Mutan

Dated: 3/2/2022

Court of Common Pleas of Philadelphia County  
Trial Division  
**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)	
<b>FEBRUARY 2022</b>	<b>000484</b>
E-Filing Number: 2202007989	
PLAINTIFF'S NAME SABREEN MUTAN	DEFENDANT'S NAME LEANID RUSINOUSKI
PLAINTIFF'S ADDRESS 11995 DUMONT STREET PHILADELPHIA PA 19116	DEFENDANT'S ADDRESS 4352 S, KIRKMAN ROAD ORLANDO FL 32811
PLAINTIFF'S NAME	DEFENDANT'S NAME IAROSLAV TRANSPORTATION, INC.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 1685 FLEETWOOD DRIVE ELGIN IL 60123
PLAINTIFF'S NAME	DEFENDANT'S NAME SIT EXPEDITORS, INC.
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS 2704 GRANVILLE AVENUE MELROSE PARK IL 60164
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 6
COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: _____
CASE TYPE AND CODE 2V - MOTOR VEHICLE ACCIDENT	
STATUTORY BASIS FOR CAUSE OF ACTION	
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)	IS CASE SUBJECT TO COORDINATION ORDER? YES    NO
<div style="text-align: center;"> <b>FILED</b>  <b>PRO PROTHY</b>  <b>FEB 03 2022</b>  <b>S. RICE</b> </div>	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>SABREEN MUTAN</u> Papers may be served at the address set forth below.	
NAME OF PLAINTIFFS/PETITIONER'S/APPELLANT'S ATTORNEY SCOTT D. SCHULMAN	ADDRESS PETRILLO & GOLDBERG 6951 N. PARK DR. PENSAUKEN NJ 08109
PHONE NUMBER (856) 486-4343	FAX NUMBER (856) 486-7979
SUPREME COURT IDENTIFICATION NO. 73642	E-MAIL ADDRESS sschulman@petrilloandgoldberg.com
SIGNATURE OF FILING ATTORNEY OR PARTY SCOTT SCHULMAN	DATE SUBMITTED Thursday, February 03, 2022, 04:08 pm

FINAL COPY (Approved by the Prothonotary Clerk)

Case ID: 220200484

**COMPLETE LIST OF DEFENDANTS:**

1. LEANID RUSINOUSKI  
4352 S, KIRKMAN ROAD  
ORLANDO FL 32811
2. IAROSLAV TRANSPORTATION, INC.  
1685 FLEETWOOD DRIVE  
ELGIN IL 60123
3. SIT EXPEDITORS, INC.  
2704 GRANVILLE AVENUE  
MELROSE PARK IL 60164
4. CAPITAL TRANSPORT, INC.  
320 CARRIER BOULEVARD  
RICHLAND MS 39218
5. ALLSTATE/FIRE CASUALTY INSURANCE COMPANY  
P.O. BOX 2874  
CLINTON IA 52733
6. JOHN DOE  
TBD  
TBD PA 000000



**FIRST JUDICIAL DISTRICT OF PENNSYLVANIA**  
**COURT OF COMMON PLEAS OF PHILADELPHIA**

Filed and Attested by the  
Office of Judicial Records  
03 FEB 2022 04:08 pm  
02 MAR 2022 02:56 pm  
E. HAURIN

Sabreen Mutan,

Plaintiff

v.

Leanid Rusinouski, et al.,

Defendants.

**NOTICE TO DEFEND**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

*You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.*

Philadelphia Bar Association  
Lawyer Referral  
and Information Service  
One Reading Center  
Philadelphia, Pennsylvania 19107  
(215) 238-6333  
TTY (215) 451-6197

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascender una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

*Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.*

Asociacion De Licenciados  
De Filadelfia  
Servicio De Referencia E  
Informacion Legal  
One Reading Center  
Filadelfia, Pennsylvania 19107  
(215) 238-6333  
TTY (215) 451-6197

PETRILLO & GOLDBERG, P.C.  
By: SCOTT D. SCHULMAN, ESQUIRE, I.D. #: 73642  
JEFFREY M. THIEL, ESQUIRE, I.D. #: 94753  
6951 North Park Drive  
Pennsauken, NJ 08109  
(856) 486-4343  
ATTORNEYS FOR PLAINTIFF

MAJOR JURY

<p>SABREEN MUTAN 11995 Dumont Road Philadelphia, PA 19116</p> <p>Plaintiff</p> <p>v.</p> <p>LEANID RUSINOUSKI 4352 S, Kirkman Road Orlando, FL 32811</p> <p>And</p> <p>IAROSLAV TRANSPORTATION, INC. 1685 Fleetwood Drive Elgin, IL 60123</p> <p>And</p> <p>SIT EXPEDITORS, INC. 2704 Granville Avenue Melrose Park, IL 60164</p> <p>And</p> <p>CAPIAL TRANSPORT, INC. 320 Carrier Boulevard Richland, MS 39218</p> <p>And</p> <p>ALLSTATE/FIRE &amp; CASUALTY INSURANCE COMPANY Med Central Houston P.O. Box 2874 Clinton, IA 52733</p> <p>and</p> <p>JOHN DOE TBD TBD</p> <p>Defendant(s)</p>	<p>PHILADELPHIA COUNTY COURT OF COMMON PLEAS</p> <p>Case ID: 220200484</p>
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**CODE 2V**  
**CIVIL ACTION COMPLAINT**  
**COUNT I**  
**MOTOR VEHICLE ACCIDENT**

1. Plaintiff Sabreen Mutan is an adult individual who resides at the above address.
2. Defendant Leanid Rusinouski is an adult individual who resides at the above address.
3. Defendant Iaroslav Transportation, Inc. is a business entity with offices at the above address which regularly does business in Philadelphia County in the Commonwealth of Pennsylvania.
4. Defendant SIT Expeditors, Inc. is a business entity with offices at the above address which regularly does business in Philadelphia County in the Commonwealth of Pennsylvania.
5. Defendant Capital Transport, Inc. is a business entity with offices at the above address which regularly does business in Philadelphia County in the Commonwealth of Pennsylvania.
6. Defendant Allstate/Fire and Casualty Insurance Company is a business entity with offices at the above address which regularly does business in Philadelphia County in the Commonwealth of Pennsylvania.
7. Defendants, John Doe, are various fictitious and currently unidentified individuals, estates, administrators/administratrix, professional associations, partnerships, institutions, corporations and/or companies, whose name and information are unknown to plaintiff despite reasonable search and the use of due diligence. As this/these defendant(s) are identified, plaintiff shall seasonably amend this civil action.
8. On or about April 8, 2020, plaintiff Sabreen Mutan was operating a motor vehicle that was stopped southbound on I-95 at or about milepost 27.1 in the City and County of Philadelphia in the Commonwealth of Pennsylvania.

9. On said date defendant Leanid Rusinouski and/or John Doe operated a vehicle traveling southbound on I-95 at or about Milepost 27.1 in the City and County of Philadelphia in the Commonwealth of Pennsylvania.
10. At or about such time and place the defendant Leanid Rusinouski and/or John Doe operated a motor vehicle in a negligent and careless manner causing said vehicle to rear end plaintiff's stopped and disabled vehicle.
11. Such negligent and careless acts by defendant Leanid Rusinouski and/or John Doe caused the plaintiff, Sabreen Mutan, to suffer serious, permanent and severe personal injuries.
12. The above described accident resulted from the negligence and carelessness of defendant Leanid Rusinouski and/or John Doe, and was due in no manner whatsoever to any act or failure to act on the part of the plaintiff, Sabreen Mutan.
13. The negligence and carelessness of defendant Leanid Rusinouski and/or John Doe consisted of:
  - (a) Failure to observe and heed traffic controls and conditions present;
  - (b) Failing to keep a proper lookout;
  - (c) Following too closely and at an unsafe speed;
  - (d) Driving while distracted; and
  - (e) Failing to operate the aforementioned vehicle in a safe and prudent manner in light of prevailing traffic controls and conditions present.
14. As a proximate and direct result of the above-described accident, the plaintiff, Sabreen Mutan, suffered serious and severe personal injuries including, but not limited to: Acute, post-traumatic headaches with occipital neuralgia; acute, post-traumatic sprain and strain of the cervical spine region with myofascitis with acute, post-traumatic cervical radicular features with upper extremity EMG/NCV confirming right subacute C5 radiculopathy; acute, post-traumatic sprain and strain/contusion of the right shoulder with bursitis, tendinitis and impingement syndrome; acute, post-traumatic sprain and stain/contusion of the right humerus; acute, post-traumatic sprain and strain



of the thoracic spine region with myofascitis with acute, post-traumatic right mid-thoracic radiculitis; acute, post-traumatic sprain and strain of the lumbar spine region with myofascitis with acute, post-traumatic lumbar radicular features and acute, post-traumatic sprain and strain/contusion of the sacroiliac joint/region all resulting in serious bodily injuries and serious impairment and personal limitation of use of a body function or system.

15. As a result of the above-described accident, plaintiff, Sabreen Mutan, has been unable to attend to her daily chores, duties and activities, all to her great detriment and loss.
16. As a further result of the above-described accident, the plaintiff has suffered severe pain, mental anguish, serious impairments of body functions, including but not limited to sitting, standing, bending, lifting, twisting, turning and other body movements and functions; and suffered, and may continue to suffer the same, for an indefinite time in the future.
17. As a further result of the above-described accident, the plaintiff, Sabreen Mutan, has or may hereafter suffer a loss of earnings and/or impairment of earnings capacity and power, all to her great financial detriment and loss.

WHEREFORE, plaintiff Sabreen Mutan, demands judgment in her favor against the defendant Leanid Rusinouski and/or John Doe and avers that the sum in controversy exceeds an amount in excess of the jurisdictional amount requiring submission to arbitration.

## **COUNT II**

### **RESPONDEAT SUPERIOR/ NEGLIGENT ENTRUSTMENT**

1. Each and every paragraph of the first count of this complaint are hereby repeated and incorporated herein as if more fully set at length.

2. Defendants, Iaroslav Transportation, Inc., SIT Expeditors, Inc., Capital Transport, Inc. and/or John Doe, at the time of the aforescribed vehicular collision and at all times relevant hereto, were the principal or employer of the defendant, Leanid Rusinouski and/or John Doe.
3. Defendant, Leanid Rusinouski and/or John Doe acted at all times relevant hereto, at the direction of, in furtherance of the goals of, at the request of or in the course of the employment of the defendants, Iaroslav Transportation, Inc., SIT Expeditors, Inc., Capital Transport, Inc. and/or John Doe.
4. Prior to, at the time of the aforescribed vehicular collision and at all times relevant hereto, defendants, Iaroslav Transportation, Inc., SIT Expeditors, Inc., Capital Transport, Inc. and/or John Doe, were negligent and/or careless in and of their own accord, in:
  - (a) employment and/or engagement of the services or agency of defendant Leanid Rusinouski and/or John Doe; and
  - (b) negligent entrustment of a motor vehicle to the defendant, Leanid Rusinouski and/or John Doe at all times relevant hereto.
5. As a direct and proximate result of the foregoing, the plaintiff, Sabreen Mutan, sustained the aforescribed injuries and damages and she has been otherwise injured and/or damaged in a permanent and severe manner.

WHEREFORE, the plaintiff, Sabreen Mutan, demands judgment in her favor, against the defendants Leanid Rusinouski, Iaroslav Transportation, Inc., SIT Expeditors, Inc., Capital

Transport, Inc. and/or John Doe and avers that the sum in controversy is an amount in excess of the jurisdictional amount requiring submission to arbitration.

**COUNT III**  
**UNINSURED MOTORIST COVERAGE**

1. Plaintiff incorporates herein the allegations set forth in the aforementioned paragraphs, inclusive, as if set forth here at length.
2. At all times material hereto the defendant Allstate Fire and Casualty Insurance Company insured the vehicle operated by the plaintiff vehicle under policy number 998462345. Said policy is in the possession of the defendant.
3. Under the aforementioned policy the defendant Allstate Fire and Casualty Insurance Company is required to provide uninsured motorist coverage for the plaintiff in an amount up to the available policy limits of said policy.
4. At all times material hereto, the defendant Leanid Rusinouski, avers that the cause of the subject vehicular collision was, or was contributed to by the presence and operation of an unidentified “Phantom” vehicle which said vehicle qualified as an uninsured vehicle pursuant to the Laws of the Commonwealth of Pennsylvania.
5. In the event that the unidentified, “Phantom” vehicle averred by defendant Leanid Rusinouski is deemed to be the cause or a contributing cause of the subject vehicular collision and said unidentified, “Phantom” vehicle is deemed uninsured pursuant to the Laws of the Commonwealth of Pennsylvania, the plaintiff is eligible for uninsured motorist benefits under the aforementioned policy.

WHEREFORE, plaintiff demands judgment in plaintiff's favor and against defendant, Allstate Fire and Casualty Insurance Company, and avers that the sum in controversy is an amount in excess of the jurisdictional amount requiring submission to arbitration.

PETRILLO & GOLDBERG, P.C.

BY: /s/ Scott D. Schulman, Esquire  
SCOTT D. SCHULMAN, ESQUIRE

Dated: February 3, 2022

**VERIFICATION**

I, Scott D. Schulman, Esquire, hereby state that I am the attorney for plaintiff in this action and that the statements in the foregoing are true and correct to the best of my knowledge, information and belief. The undersigned understands that if any of the statements made herein are willfully false that I am subject to punishment pursuant to Pa. C.S.C. ' 4904.

/s/ Scott D. Schulman, Esquire  
SCOTT D. SCHULMAN, ESQUIRE

Dated: February 3, 2022



**VERIFICATION**

I, Sabreen Mutan, hereby state that I am the plaintiff in this action and that the statements in the foregoing are true and correct to the best of my knowledge, information and belief. The undersigned understands that if any of the statements made herein are willfully false that I am subject to punishment pursuant to Pa. C.S.C. ' 4904.

---

SABREEN MUTAN

Dated:

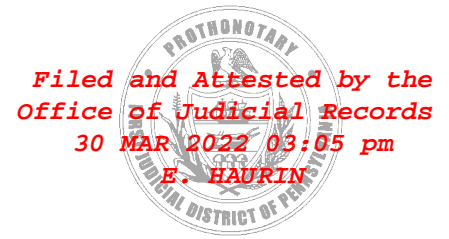
**VERIFICATION**

I, Sabreen Mutan, hereby state that I am the plaintiff in this action and that the statements in the foregoing are true and correct to the best of my knowledge, information and belief. The undersigned understands that if any of the statements made herein are willfully false that I am subject to punishment pursuant to Pa. C.S.C. ' 4904.

Dated: 2/3/2022

  
\_\_\_\_\_  
SABREEN MUTAN

PETRILLO & GOLDBERG, P.C.  
By: SCOTT D. SCHULMAN, ESQUIRE  
I.D. #: 73642  
6951 North Park Drive  
Pennsauken, NJ 08109  
(856)486-4343  
ATTORNEYS FOR PLAINTIFF



<p>SABREEN MUTAN, Plaintiff,  v.  LEANID RUSINOUSKI, et al.  Defendants</p>	<p>PHILADELPHIA COUNTY COURT OF COMMON PLEAS  February TERM, 2022  NO. 000484</p>
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**PRAECIPE TO REINSTATE COMPLAINT**

**TO THE PROTHONOTARY:**

Kindly reinstate the attached complaint which was previously filed with the Court in the above captioned civil action for an additional 30 days.

By: /s/ Scott D. Schulman, Esquire  
SCOTT D. SCHULMAN, ESQUIRE  
Attorney for Plaintiff Sabreen Mutan

Dated: 3/30/2022

Court of Common Pleas of Philadelphia County  
Trial Division**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

**FEBRUARY 2022****000484**

E-Filed Number: 2202007989

PLAINTIFF'S NAME SABREEN MUTAN		DEFENDANT'S NAME LEANID RUSINOWSKI	
PLAINTIFF'S ADDRESS 11995 DUMONT STREET PHILADELPHIA PA 19116		DEFENDANT'S ADDRESS 4352 S. KIRKMAN ROAD ORLANDO FL 32811	
PLAINTIFF'S NAME		DEFENDANT'S NAME IAROSLAV TRANSPORTATION, INC.	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 1685 FLEETWOOD DRIVE ELGIN IL 60123	
PLAINTIFF'S NAME		DEFENDANT'S NAME SIT EXPEDITORS, INC.	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 2704 GRANVILLE AVENUE MELROSE PARK IL 60164	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 6	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Not-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Other: _____		
CASE TYPE AND CODE 2V - MOTOR VEHICLE ACCIDENT			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES      NO	
		<b>FILED</b> <b>PRO PROTHY</b> <b>FEB 03 2022</b> <b>S. RICE</b>	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>SABREEN MUTAN</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY SCOTT D. SCHULMAN		ADDRESS PETRILLO & GOLDBERG 6951 N. PARK DR. PENSAUKEN NJ 08109	
PHONE NUMBER (856) 486-4343	FAX NUMBER (856) 486-7979		
SUPREME COURT IDENTIFICATION NO. 73642		E-MAIL ADDRESS sschulman@petrilloandgoldberg.com	
SIGNATURE OF FILING ATTORNEY OR PARTY SCOTT SCHULMAN		DATE SUBMITTED Thursday, February 03, 2022, 04:08 pm	

FINAL COPY (Approved by the Prothonotary Clerk)

Case ID: 220200484



**COMPLETE LIST OF DEFENDANTS:**

1. LEANID RUSINOUSKI  
4352 S, KIRKMAN ROAD  
ORLANDO FL 32811
2. IAROSLAV TRANSPORTATION, INC.  
1685 FLEETWOOD DRIVE  
ELGIN IL 60123
3. SIT EXPEDITORS, INC.  
2704 GRANVILLE AVENUE  
MELROSE PARK IL 60164
4. CAPITAL TRANSPORT, INC.  
320 CARRIER BOULEVARD  
RICHLAND MS 39218
5. ALLSTATE/FIRE CASUALTY INSURANCE COMPANY  
P.O. BOX 2874  
CLINTON IA 52733
6. JOHN DOE  
TBD  
TBD PA 000000

FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
COURT OF COMMON PLEAS OF PHILADELPHIA



Sabreen Mutan,

Plaintiff

v.

Leanid Rusinouski, et al.,

Defendants.

**NOTICE TO DEFEND**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

*You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.*

Philadelphia Bar Association  
Lawyer Referral  
and Information Service  
One Reading Center  
Philadelphia, Pennsylvania 19107  
(215) 238-6333  
TTY (215) 451-6197

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

*Lleve esta demanda a un abogado inmediatamente. Si no tiene abogado o si no tiene el dinero suficiente de pagar tal servicio. Vaya en persona o llame por telefono a la oficina cuya direccion se encuentra escrita abajo para averiguar donde se puede conseguir asistencia legal.*

Asociacion De Licenciados  
De Filadelfia  
Servicio De Referencia E  
Informacion Legal  
One Reading Center  
Filadelfia, Pennsylvania 19107  
(215) 238-6333  
TTY (215) 451-6197

PETRILLO & GOLDBERG, P.C.  
By: SCOTT D. SCHULMAN, ESQUIRE, I.D. #: 73642  
JEFFREY M. THIEL, ESQUIRE, I.D. #: 94753  
6951 North Park Drive  
Pennsauken, NJ 08109  
(856) 486-4343  
ATTORNEYS FOR PLAINTIFF

MAJOR JURY

<p>SABREEN MUTAN 11995 Dumont Road Philadelphia, PA 19116</p> <p>Plaintiff</p> <p>v.</p> <p>LEANID RUSINOUSKI 4352 S, Kirkman Road Orlando, FL 32811</p> <p>And</p> <p>IAROSLAV TRANSPORTATION, INC. 1685 Fleetwood Drive Elgin, IL 60123</p> <p>And</p> <p>SIT EXPEDITORS, INC. 2704 Granville Avenue Melrose Park, IL 60164</p> <p>And</p> <p>CAPIAL TRANSPORT, INC. 320 Carrier Boulevard Richland, MS 39218</p> <p>And</p> <p>ALLSTATE/FIRE &amp; CASUALTY INSURANCE COMPANY Med Central Houston P.O. Box 2874 Clinton, IA 52733</p> <p>and</p> <p>JOHN DOE TBD TBD</p> <p>Defendant(s)</p>	<p>PHILADELPHIA COUNTY COURT OF COMMON PLEAS</p>
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**CODE 2V**  
**CIVIL ACTION COMPLAINT**  
**COUNT I**  
**MOTOR VEHICLE ACCIDENT**

1. Plaintiff Sabreen Mutan is an adult individual who resides at the above address.
2. Defendant Leanid Rusinouski is an adult individual who resides at the above address.
3. Defendant Iaroslav Transportation, Inc. is a business entity with offices at the above address which regularly does business in Philadelphia County in the Commonwealth of Pennsylvania.
4. Defendant SIT Expeditors, Inc. is a business entity with offices at the above address which regularly does business in Philadelphia County in the Commonwealth of Pennsylvania.
5. Defendant Capital Transport, Inc. is a business entity with offices at the above address which regularly does business in Philadelphia County in the Commonwealth of Pennsylvania.
6. Defendant Allstate/Fire and Casualty Insurance Company is a business entity with offices at the above address which regularly does business in Philadelphia County in the Commonwealth of Pennsylvania.
7. Defendants, John Doe, are various fictitious and currently unidentified individuals, estates, administrators/administratrix, professional associations, partnerships, institutions, corporations and/or companies, whose name and information are unknown to plaintiff despite reasonable search and the use of due diligence. As this/these defendant(s) are identified, plaintiff shall seasonably amend this civil action.
8. On or about April 8, 2020, plaintiff Sabreen Mutan was operating a motor vehicle that was stopped southbound on I-95 at or about milepost 27.1 in the City and County of Philadelphia in the Commonwealth of Pennsylvania.

9. On said date defendant Leanid Rusinouski and/or John Doe operated a vehicle traveling southbound on I-95 at or about Milepost 27.1 in the City and County of Philadelphia in the Commonwealth of Pennsylvania.
10. At or about such time and place the defendant Leanid Rusinouski and/or John Doe operated a motor vehicle in a negligent and careless manner causing said vehicle to rear end plaintiff's stopped and disabled vehicle.
11. Such negligent and careless acts by defendant Leanid Rusinouski and/or John Doe caused the plaintiff, Sabreen Mutan, to suffer serious, permanent and severe personal injuries.
12. The above described accident resulted from the negligence and carelessness of defendant Leanid Rusinouski and/or John Doe, and was due in no manner whatsoever to any act or failure to act on the part of the plaintiff, Sabreen Mutan.
13. The negligence and carelessness of defendant Leanid Rusinouski and/or John Doe consisted of:
  - (a) Failure to observe and heed traffic controls and conditions present;
  - (b) Failing to keep a proper lookout;
  - (c) Following too closely and at an unsafe speed;
  - (d) Driving while distracted; and
  - (e) Failing to operate the aforementioned vehicle in a safe and prudent manner in light of prevailing traffic controls and conditions present.
14. As a proximate and direct result of the above-described accident, the plaintiff, Sabreen Mutan, suffered serious and severe personal injuries including, but not limited to: Acute, post-traumatic headaches with occipital neuralgia; acute, post-traumatic sprain and strain of the cervical spine region with myofascitis with acute, post-traumatic cervical radicular features with upper extremity EMG/NCV confirming right subacute C5 radiculopathy; acute, post-traumatic sprain and strain/contusion of the right shoulder with bursitis, tendinitis and impingement syndrome; acute, post-traumatic sprain and stain/contusion of the right humerus; acute, post-traumatic sprain an strain



of the thoracic spine region with myofascitis with acute, post-traumatic right mid-thoracic radiculitis; acute, post-traumatic sprain and strain of the lumbar spine region with myofascitis with acute, post-traumatic lumbar radicular features and acute, post-traumatic sprain and strain/contusion of the sacroiliac joint/region all resulting in serious bodily injuries and serious impairment and personal limitation of use of a body function or system.

15. As a result of the above-described accident, plaintiff, Sabreen Mutan, has been unable to attend to her daily chores, duties and activities, all to her great detriment and loss.
16. As a further result of the above-described accident, the plaintiff has suffered severe pain, mental anguish, serious impairments of body functions, including but not limited to sitting, standing, bending, lifting, twisting, turning and other body movements and functions; and suffered, and may continue to suffer the same, for an indefinite time in the future.
17. As a further result of the above-described accident, the plaintiff, Sabreen Mutan, has or may hereafter suffer a loss of earnings and/or impairment of earnings capacity and power, all to her great financial detriment and loss.

WHEREFORE, plaintiff Sabreen Mutan, demands judgment in her favor against the defendant Leanid Rusinouski and/or John Doe and avers that the sum in controversy exceeds an amount in excess of the jurisdictional amount requiring submission to arbitration.

## **COUNT II**

### **RESPONDEAT SUPERIOR/ NEGLIGENT ENTRUSTMENT**

1. Each and every paragraph of the first count of this complaint are hereby repeated and incorporated herein as if more fully set at length.

2. Defendants, Iaroslav Transportation, Inc., SIT Expeditors, Inc., Capital Transport, Inc. and/or John Doe, at the time of the aforescribed vehicular collision and at all times relevant hereto, were the principal or employer of the defendant, Leanid Rusinouski and/or John Doe.
3. Defendant, Leanid Rusinouski and/or John Doe acted at all times relevant hereto, at the direction of, in furtherance of the goals of, at the request of or in the course of the employment of the defendants, Iaroslav Transportation, Inc., SIT Expeditors, Inc., Capital Transport, Inc. and/or John Doe.
4. Prior to, at the time of the aforescribed vehicular collision and at all times relevant hereto, defendants, Iaroslav Transportation, Inc., SIT Expeditors, Inc., Capital Transport, Inc. and/or John Doe, were negligent and/or careless in and of their own accord, in:
  - (a) employment and/or engagement of the services or agency of defendant Leanid Rusinouski and/or John Doe; and
  - (b) negligent entrustment of a motor vehicle to the defendant, Leanid Rusinouski and/or John Doe at all times relevant hereto.
5. As a direct and proximate result of the foregoing, the plaintiff, Sabreen Mutan, sustained the aforescribed injuries and damages and she has been otherwise injured and/or damaged in a permanent and severe manner.

WHEREFORE, the plaintiff, Sabreen Mutan, demands judgment in her favor, against the defendants Leanid Rusinouski, Iaroslav Transportation, Inc., SIT Expeditors, Inc., Capital

Transport, Inc. and/or John Doe and avers that the sum in controversy is an amount in excess of the jurisdictional amount requiring submission to arbitration.

**COUNT III**  
**UNINSURED MOTORIST COVERAGE**

1. Plaintiff incorporates herein the allegations set forth in the aforementioned paragraphs, inclusive, as if set forth here at length.
2. At all times material hereto the defendant Allstate Fire and Casualty Insurance Company insured the vehicle operated by the plaintiff vehicle under policy number 998462345. Said policy is in the possession of the defendant.
3. Under the aforementioned policy the defendant Allstate Fire and Casualty Insurance Company is required to provide uninsured motorist coverage for the plaintiff in an amount up to the available policy limits of said policy.
4. At all times material hereto, the defendant Leanid Rusinouski, avers that the cause of the subject vehicular collision was, or was contributed to by the presence and operation of an unidentified “Phantom” vehicle which said vehicle qualified as an uninsured vehicle pursuant to the Laws of the Commonwealth of Pennsylvania.
5. In the event that the unidentified, “Phantom” vehicle averred by defendant Leanid Rusinouski is deemed to be the cause or a contributing cause of the subject vehicular collision and said unidentified, “Phantom” vehicle is deemed uninsured pursuant to the Laws of the Commonwealth of Pennsylvania, the plaintiff is eligible for uninsured motorist benefits under the aforementioned policy.

WHEREFORE, plaintiff demands judgment in plaintiff's favor and against defendant, Allstate Fire and Casualty Insurance Company, and avers that the sum in controversy is an amount in excess of the jurisdictional amount requiring submission to arbitration.

PETRILLO & GOLDBERG, P.C.

BY: /s/ Scott D. Schulman, Esquire  
SCOTT D. SCHULMAN, ESQUIRE

Dated: February 3, 2022

**VERIFICATION**

I, Scott D. Schulman, Esquire, hereby state that I am the attorney for plaintiff in this action and that the statements in the foregoing are true and correct to the best of my knowledge, information and belief. The undersigned understands that if any of the statements made herein are willfully false that I am subject to punishment pursuant to Pa. C.S.C. ' 4904.

/s/ Scott D. Schulman, Esquire  
SCOTT D. SCHULMAN, ESQUIRE

Dated: February 3, 2022

**VERIFICATION**

I, Sabreen Mutan, hereby state that I am the plaintiff in this action and that the statements in the foregoing are true and correct to the best of my knowledge, information and belief. The undersigned understands that if any of the statements made herein are willfully false that I am subject to punishment pursuant to Pa. C.S.C. ' 4904.

---

SABREEN MUTAN

Dated:

**VERIFICATION**

I, Sabreen Mutan, hereby state that I am the plaintiff in this action and that the statements in the foregoing are true and correct to the best of my knowledge, information and belief. The undersigned understands that if any of the statements made herein are willfully false that I am subject to punishment pursuant to Pa. C.S.C. ' 4904.

Dated: 2/3/2022

  
SABREEN MUTAN